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December 17, 2019

**VIA ECF**

Honorable Pamela K. Chen  
United States District Judge  
United States District Court, Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: *Freeman, et al. v. HSBC Holdings plc, et al.*, 18-cv-7359 (PKC)(CLP) (“*Freeman II*”)  
(with enclosure)  
*Bowman, et al. v. HSBC Holdings plc, et al.*, 19-cv-2146 (PKC)(CLP) (“*Bowman*”)  
(without enclosure)**

Dear Judge Chen:

We represent Plaintiffs in the above-captioned cases. In accordance with Your Honor’s December 2, 2019 Order, Plaintiffs filed their Amended Complaint in *Freeman II* last evening. See ECF No. 72. For the Court’s convenience, we are providing a redline so that the Court can more easily identify the allegations added and other modifications Plaintiffs have made to the initial *Freeman II* Complaint.<sup>1</sup>

Insofar as the December 2 Order did not direct Plaintiffs to file an analogous amended complaint in *Bowman*, we have not yet done so. With the Court’s permission, Plaintiffs’ counsel will file a nearly identical amended complaint in *Bowman* by year’s end. The only anticipated difference in content between that amendment and the one filed yesterday in *Freeman II* is in the listing of plaintiffs and the respective individual attacks.

We thank the Court for its further guidance in this matter.

Respectfully submitted,

/s/ Gary M. Osen

cc: All Counsel via e-mail

Encl. as filed in *Freeman II*.

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<sup>1</sup> Because Microsoft Word’s redlining algorithm can make identifying changes in such a long document difficult, Plaintiffs have attempted to manually redline certain portions. Therefore, the resulting redline may differ in formatting and other *de minimus* ways from the filed Amended Complaint.